



STATE OF WASHINGTON
REQUEST FOR SAFETY VALVE WAIVER FOR ADDITIONAL NUMBERING RESOURCES

Date: September 23, 2011

Applicable FCC Regulations

- According to FCC requirements (47 CFR 52.15 (g)), to qualify for additional numbering resources carriers must submit paperwork demonstrating the rate center for which the numbers are requested is at or less than six Months-To-Exhaust (MTE) and is at 75% or more utilization.
- In cases where a service provider is not able to meet a specific customer request with available inventory, the FCC has determined that the state commissions will have jurisdiction - FCC 01-362, Section IV, C, paras. 57-66.
- FCC recommends the State respond within 10 days - FCC 01-362, Section IV, C paragraph 66.

Location

NPA: 509 Switch: SPKWA01DS1
 NANPA Forecast Exhaust for this NPA: 3Q2020 NXXs Available: 141
 Rate Center: Spokane
 Blocks Available in Pooling Administrator's Inventory for this rate center: 16

Request Specifics

Request is for: Customer Request (customer letter attached): Washington State University
 Other: _____

- Quantity of Telephone Numbers Needed: 1,000
- Restrictions: any block in range: 509-7XX-XXXX
- Qwest or customer business need for the restriction: internal dialing plan.
- Date the numbers will be put into service by the customer: upon receipt
- Will the numbers be added to the customer's inventory or will they be returning any numbers, if so, how many?
The numbers are required to support growth on the campus. Specifically the new block of 1000 DID's will be used for E911 purposes and will be assigned to the PSALI database.
- Other vital information unique to this request: A new NXX will be required for this request. There are no blocks in PA Pool Inventory with an NXX in the format of 509-7XX-XXXX.

Qwest will assign the requested numbers to the customer within six months from the LERG effective date.

Demonstration of Need

First, Bruce Bennett Qwest Code Administrator examined the switch where the numbering resources are required and confirmed the switch does not have the numbering resources meeting the required need. The Qwest Code Administrator then examined the remaining Qwest switches in the rate center, if the rate center is served by multiple switches, and confirmed that those switches do not have numbers which could be moved to the switch where the numbers are needed.

9/23/2011 Date Part 1A and MTE (Months-to-Exhaust) worksheet sent to NeuStar NANPA/PA, either manually or via their online system, requesting numbering resources to satisfy the need (application attached).

9/23/2011 Date of either automated or manual denial from NeuStar NANPA/PA (denial attached).

Qwest's request was denied because the MTE for the rate center was too high or because the utilization rate was too low, or both.

Rate Center MTE: 1115/14 months

Rate Center Utilization: 61.56%

TBPAAG Attachment 1 - March 19, 2007

Thousands-Block Application Form - Part 1A

Tracking Number: 509-SPOKANE-WA-484772

Full NXX: Pool Replenishment

Type of Application: New Change Disconnect

GENERAL APPLICATION INFORMATION**1.1 Contact Information:**Block Applicant:

Company Name: QWEST CORPORATION

Headquarters Address: 1801 California

City, State, Zip: Denver, CO, 80202

Contact Name: Bruce Bennett

Contact Address: 700 W. Mineral Room MN D18.12

City, State, Zip: Littleton, CO, 80120

Phone: 303-707-7013 FAX: 303-707-9577 E-mail: bruce.bennett@CenturyLink.com

Pooling Administrator: ⁱⁱ

Contact Name: Kevin Gatchell

Contact Address: 1800 Sutter St

City, State, Zip: Concord, CA, 94520

Phone: 925-363-8742 FAX: 925-363-7692

E-mail: kevin.gatchell@neustar.biz

1.2 General Information:

Check one : No LRN needed LRN needed ⁱⁱⁱ

NPA: LATA: OCN: ^{iv} 9638 Parent Company's OCN 9600

OCN:Inter-company Effective Date

Change block : Yes _____ If Yes , list NPA-NXX-X _____

1.6 Block Return :

- a) Is this block Contaminated Yes _____ No _____
 b) If Yes how many TNs are NOT available for assignment : _____
 c) Have all new Intra SP ports been completed in the NPAC Yes _____ No _____
 d) Has this block been protected from further assignment Yes _____ No _____

Disconnect block : Yes _____ If Yes , list NPA-NXX-X _____

Remarks:

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines(ATIS-0300066) available on the ATIS web site (<http://www.atis.org/inc>) or by contacting inc@atis.org as of the date of this application.

Bruce Bennett

Signature of Block Applicant

Regulatory 09/22/2011
Manager

Title Date

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI™ tandem of the facilities based provider^{xi}. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange

carrier, competitive local exchange carrier, interexchange carrier, CMRS. The also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied. The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Foot Notes :

- ⁱ Identify the type of change(s) in Section 1.5.
- ⁱⁱ The Pool Administrator is available to assist in completing these forms.
- ⁱⁱⁱ A CO Code application will also need to be submitted to the PA.
- ^{iv} Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).
- ^v This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI™ code of the switch /POI.
- ^{vi} Rate Center name must be a tariffed Rate Center.
- ^{vii} Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.
- ^{viii} Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).
- ^{ix} Select if you are the current Block Holder.
- ^x Select if you are not the current Block Holder
- ^{xi} Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

Appendix 3

May 16, 2008

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: [REDACTED]

Date: **09/22/2011** OCN: **9638** Company Name: **QWEST CORPORATION**

Rate Center: **SPOKANE**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): [REDACTED]



Name of Block Applicant: **Bruce Bennett** Signature: **Bruce Bennett**

Title: **Regulatory Manager** Telephone No.: **303-707-7013**
FAX No.: **303-707-9577**

E-mail: **bruce.bennett@CenturyLink.com**

A. Available Numbers: [REDACTED]

B. Assigned Numbers: [REDACTED]

C. Total Numbering Resources: [REDACTED]

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation [REDACTED]

List
Excluded
Code(s) or
Block(s):

Month Month Month Month Month Month Month Month Month Month Month Month Month
#1 #2 #3 #4 #5 #6 #7 #8 #9 #10 #11 #12

E. Growth History - Previous 6 months³ [REDACTED]

F. Forecast - Next 12 months⁴ [REDACTED]

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): **166.667**

H. Months to Exhaust⁵ = $\frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$

Average Monthly Forecast(G)

Block Requested	Available Numbers	Months To Exhaust
[REDACTED]	[REDACTED]	[REDACTED]

I. Utilization⁶ = $\frac{\text{Assigned Numbers(B) - Excluded Numbers(D)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 =$ [REDACTED]

Total Numbering Resources(C)-Excluded Numbers(D)

Explanation: A Numbering Safety Valve Waiver request will need to be submitted to the WUTC, requesting the opening of a new NXX in the format 509-7XX format.

¹A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

²Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

³Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

⁴Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁵To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, section 52.15 (g) (3) (iii)).

⁶Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

November 21, 2003

Attachment 3

ATIS-0300066.at3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number :



Date of Application: 09/22/2011 Effective Date: _____
Date of Receipt: 09/22/2011 Date of Response: 09/22/2011

Service Provider Name: QWEST CORPORATION
(Telcordia TM LERG TM Routing Guide) OCN: 9638

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Kevin Gatchell Phone: 925-363-8742

Signature of Pooling Administrator

Kevin Gatchell Fax: 925-363-7692

Name (print)

Email: kevin.gatchell@neustar.biz

NPA-NXX or NPA-NXX-
X : _____

Block Assigned: _____
Block Reserved : _____
Block Reservation Expiration
Date : _____
Block/Code Modified : _____
Block/Code Disconnected : _____

Block Contaminated(Yes or No) : _____
If Yes,enter the number of TNs contaminated : _____

Switch Identification(Switch Entity/POI): ¹
Rate Center: _____
Rate Center Sub Zone: _____

Form Complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code is denied. You may proceed with requesting a State Walver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands'Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

Request withdrawn.

Explanation:

Assignment activity suspended by the administrator.

Explanation:

Remarks:

¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI TM Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)